

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
MIDLAND DIVISION

In Re:	§	
	§	
RAIDER OILFIELD SERVICES, LLC,	§	Case Number 16-70101
	§	Chapter 11
Debtor.	§	

**APPLICATION TO EMPLOY ATTORNEY**

TO THE HONORABLE RONALD B. KING, CHIEF U.S. BANKRUPTCY JUDGE:

Comes now, RAIDER OILFIELD SERVICES, LLC (hereinafter the "Applicant") and files this its Application to Employ Attorney for the Debtor and respectfully represents:

1. On the 17th day of June, 2016, the Applicant filed a Petition herein under Chapter 11 of the Bankruptcy Code.
2. The Applicant has continued in possession of its property, and Applicant, as a Debtor-in-Possession, wishes to employ James & Haugland, P.C., attorneys duly admitted to practice in this Court.
3. The Applicant has selected James & Haugland, P.C., and specifically Wiley F. James, III for the following reasons: James & Haugland, P.C. has considerable experience in matters of this character; James & Haugland, P.C. has previous Chapter 11 experience in handling oilfield service company matters.
4. The offices of James & Haugland, P.C. are located at 609 Montana Avenue, El Paso, Texas 79902. The telephone number is (915) 532-3911; facsimile number is (915) 541-6440. The e-mail address for Wiley F. James, III is [wjames@jghpc.com](mailto:wjames@jghpc.com).
5. The Applicant has paid the sum of \$21,717.00 to James & Haugland, P.C. as a retainer for

bankruptcy counseling and preparation of the Chapter 11 papers. The Applicant has agreed to pay an hourly rate to James & Haugland, P.C. as follows:

Wiley F. James, III	\$350.00
Corey W. Haugland	\$350.00
Jamie T. Wall	\$250.00
Paralegals	\$100.00

6. The professional services that James & Haugland, P.C. are to render are:
- a) Analysis of the Applicant's financial situation, and rendering advice to the Applicant in determining whether to file a petition in bankruptcy;
  - b) Preparation and filing of the Voluntary Petition, Schedules, Statement of Financial Affairs, Plan of Reorganization and Disclosure Statement, as required;
  - c) Representation of the Applicant at the meeting of creditors and confirmation hearing, and any adjourned hearings thereof.
  - d) Representation of the Applicant in adversary proceedings and other contested bankruptcy matters.
  - e) To give the Applicant legal advice with respect to powers and duties as a Debtor-in-Possession and the continued operation of the business;
  - f) To prepare on behalf of the Applicant, as a Debtor-in-Possession, the necessary applications, answers, orders, reports and other papers, including but not limited to claims objections and pursuit of Chapter 5 causes of action;
  - g) To help the Applicant with any necessary documents for the obtaining of post-petition credits, offsets, etc.;
  - h) To perform all of the legal services for the Applicant, as a Debtor-in-Possession, which may be necessary herein;
  - I) Prepare Disclosure Statement and Plan of Reorganization;
  - j) Obtain approval of Disclosure Statement and confirmation of Plan of Reorganization;
  - k) To file and prosecute any post-confirmation Objections to Claim, contested matters and adversary proceedings; and
  - l) Perform all necessary post-confirmation tasks to substantially consummate the Plan

of Reorganization.

7. It is necessary for the Applicant, as a Debtor-in-Possession, to employ an attorney for such professional services.
8. James & Haugland, P.C. has not represented any officer, director or shareholder of the Debtor, or the Debtor, prior to date of the filing of this bankruptcy case.
9. The Applicant desires to employ James & Haugland, P.C. under a general retainer because of the extensive legal services required.
10. James & Haugland, P.C. be employed under the local standards which permit James and Haugland, P.C. to be paid eighty percent (80%) of the monthly fee filling and one hundred percent (100%) of the monthly expenses.
11. James & Haugland, P.C. shall be permitted to seek and obtain a carve-out for the legal fees and expenses from one or more secured creditors.
12. James & Haugland, P.C. represents no interest adverse to the Applicant, as a Debtor-in-Possession, to the Estate or any other party in interest, its respective attorneys and accountants, in matters upon which it is to be engaged for the Applicant.
13. The employment of James & Haugland, P.C. would be to the best interest of this Estate and is, in fact, a necessity as the Bankruptcy Rules require a corporation to be represented by counsel during a bankruptcy case.
14. A copy of the Engagement Letter between the Debtor and the James & Haugland, P.C. is attached hereto as Exhibit "A".

**WHEREFORE, PREMISES CONSIDERED,** RAIDER OILFIELD SERVICES, LLC prays that it be authorized to employ and appoint James & Haugland, P.C., under general retainer,

to represent it as Debtor-in-Possession in this proceeding under Chapter 11 of Title 11, U.S.C., and that it have such other and further relief as is just.

DATED this 17 day June, 2016.

Respectfully submitted,

RAIDER OILFIELD SERVICES, LLC

By:   
Jason Hopper, Managing Member

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**AFFIDAVIT OF PROPOSED ATTORNEY**

THE STATE OF TEXAS     §  
                                     §  
COUNTY OF EL PASO     §

BEFORE ME, the undersigned authority, a notary public for the State of Texas, on this day personally appeared WILEY F. JAMES, III, known to me to be the person whose name is subscribed to this Affidavit of Proposed Attorney, and who, after being first sworn, on his oath did depose and say:

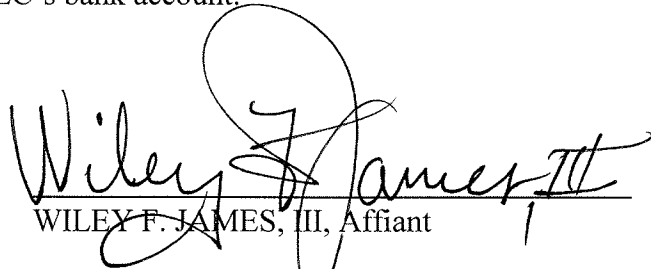
“I, WILEY F. JAMES, hereby make solemn oath:

1. I am an attorney and counselor at law, duly admitted to practice in the State of Texas and in this Court.
2. I am a shareholder in the law firm of James & Haugland, P.C., and maintain offices for the practice of law at 609 Montana Avenue, El Paso, Texas 79902.
3. The firm has no connection with Raider Oilfield Services, LLC (hereinafter referred to as “Applicant”), its creditors, or any other party in interest herein.
4. James & Haugland, P.C. represents no interest adverse to the Applicant as a Debtor-in-Possession herein or the Estate in the matters upon which the firm is to be engaged.
5. James & Haugland, P.C. has never represented any officer, director or shareholder of the Debtor prior to the date of the filing of this bankruptcy case.
6. Except for debt counseling and Chapter 11 case preparation, James & Haugland, P.C.

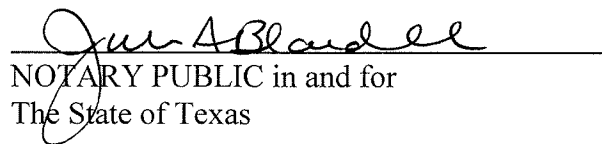
has not represented the Debtor prior to the filing of this case.

7. James & Haugland, P.C. seeks employment and compensation pursuant to § 327 and approval of compensation pursuant to § 330 of the Bankruptcy Code.
8. James & Haugland, P.C. received the sum of \$21,717.00 as a retainer for performance of legal services related to debt counseling, preparation of a Chapter 11 bankruptcy case and performance of legal services during the Chapter 11 case.
9. James & Haugland, P.C. received the \$21,717.00 retainer via wire transfer from Raider Oilfield Services, LLC's bank account.

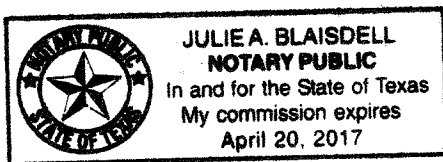
Further, Affiant sayeth naught."

  
WILEY F. JAMES, III, Affiant

SUBSCRIBED AND SWORN TO BEFORE ME on this 17<sup>th</sup> day of June, 2016  
to certify which, witness my hand and seal of office.

  
NOTARY PUBLIC in and for  
The State of Texas

My Commission Expires:



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**ORDER APPROVING EMPLOYMENT OF**  
**JAMES & HAUGLAND, P.C. AS DEBTOR'S COUNSEL**

On this day, came on to be considered the Application to Employ Attorney [Docket No. \_\_\_\_] (hereinafter "Application") filed on the \_\_\_\_\_ day of \_\_\_\_\_, 2016, and the Court, being of the opinion that the Application is well taken, will hereby approve same. It is therefore,

**ORDERED, ADJUDGED and DECREED** that the employment of James & Haugland, P.C., as counsel for the Debtor-in-Possession be, and it is hereby approved pursuant to § 327 of the Bankruptcy Code. It is further,

**ORDERED, ADJUDGED and DECREED** that said counsel shall, within ten (10) days of

the entry hereof, serve the statements required by Bankruptcy Code § 329(a) and Bankruptcy Rule 2016(b) and a copy of this Order, upon the United States Trustee, any committees, the twenty (20) largest unsecured creditors, all secured creditors, and any counsel or parties previously filing a notice of appearance and request for notice. It is further

**ORDERED, ADJUDGED and DECREED** that said counsel shall disclose in said statement the amount and source of any retainer or any other payment received by said counsel in connection with or in contemplation of this case. It is further

**ORDERED, ADJUDGED and DECREED** that any objection to this Order must be filed within 21 days from the date of this Order. If an objection is received from the U.S. Trustee, any creditor or party-in-interest, the affected professional shall request a hearing before the Court.

# # #

Submitted by:

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